

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ACCURIDE ERIE, L.P.,	)	
	)	
Plaintiff/Counterclaim Defendant,	)	Civil Action No. 1:05-CV-00169
	)	
v.	)	Judge Sean J. McLaughlin
	)	
INTERNATIONAL UNION, UNITED	)	
AUTOMOBILE, AEROSPACE, AND	)	
AGRICULTURAL IMPLEMENT	)	
WORKERS OF AMERICA, LOCAL 1186,	)	
	)	
Defendant/Counterclaim Plaintiff.	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION  
FOR ORDER TO SHOW CAUSE, OR IN THE ALTERNATIVE,  
TO REMAND REMEDIAL ISSUES**

Plaintiff/Counterclaim Defendant, Accuride Erie, L.P. (“Accuride”), by its undersigned counsel, files this Motion for Extension of Time to Respond to the Motion for Order to Show Cause, or in the Alternative, to Remand Remedial Issues, filed by Defendant/Counterclaim Plaintiff, International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, Local 1186 (“UAW”), and states as follows:

1. This action was initiated by Accuride on or about May 27, 2005. (Docket #1).
2. On or about February 10, 2006 and March 13, 2006, the Parties cross filed motions for summary judgment, which were decided by the Court on or about August 11, 2006, thereby closing this action. (Docket #39).
3. On or about December 11, 2007, the U.S. Court of Appeals for the Third Circuit affirmed the Court’s August 11, 2006 Order. (Docket #44).
4. On or about May 13, 2008, the UAW filed a Motion for Order to Show Cause Why Accuride Should Not be Held in Contempt, or in the Alternative, to Remand Remedial

Issues to Arbitrator Creo for Clarification. (Docket #49).

5. At the same time, counsel for the UAW initiated a related action against Accuride at Civil Action No. 1:08-cv-00145 SJM.

6. Accuride has been directed to respond to the UAW's motion in this action on or before June 3, 2008, and to answer or otherwise respond to the Complaint filed in Civil Action No. 1:08-cv-00145 SJM on or before June 9, 2008.

7. Accuride respectfully requests an extension of time, until June 9, 2008, to respond to the UAW's motion, the same deadline that is set for Accuride to answer or otherwise respond to the Complaint filed in Civil Action No. 1:08-cv-00145 SJM.

8. Counsel for Accuride has contacted Joyce Goldstein, counsel for the UAW, regarding this request, and Ms. Goldstein has communicated that the UAW will not oppose Accuride's motion for an extension of time.

WHEREFORE, Accuride respectfully requests an extension of time, until June 9, 2008 to respond to the UAW's Motion for Order to Show Cause, or in the Alternative, to Remand Remedial Issues. A proposed Order of Court is attached hereto.

Respectfully submitted,

/s/ Shannon H. Paliotta

Frederick C. Miner, (AZ #18854)\*  
Shannon Huygens Paliotta, (PA #91000)  
**LITTLER MENDELSON, P.C.**  
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\*Motion to Appear *Pro Hac Vice* Pending

Dated: May 29, 2008

*Attorneys for Defendant Accuride Erie, L.P.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of May, 2008, a copy of the foregoing **Unopposed Motion for Extension of Time to Respond to Motion for Order to Show Cause, or in the Alternative, to Remand Remedial Issues** was filed using the Western District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

Joyce Goldstein  
Joyce Goldstein & Associates  
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*/s/ Shannon H. Paliotta*

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